

**Fill in this information to identify the case:**

Debtor 1 Bradley C. Eaton

Debtor 2 Debbie A. Eaton  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 19-10158 JCM

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known): 19-1

Last 4 digits of any number you use to identify the debtor's account: 0341

Property address:

321 West Townhall Road  
Waterford, PA 16441

**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 06 / 01 / 2024

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_

c. Total. Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Bradley C. Eaton and Debbie A. Eaton  
First Name Middle Name Last Name

Case Number (if known): 19-10158 JCM

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

*x/s/ Denise Carlon*

Date 05/20/2024

PA Western BK  
20 May 2024, 16:29:56, EDT

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
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[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Debbie A. Eaton  
Bradley C. Eaton dba B&J Snow  
Removal**

**Debtor(s)**

**Freedom Mortgage Corporation  
Movant  
vs.**

**Debbie A. Eaton  
Bradley C. Eaton dba B&J Snow  
Removal**

**Debtor(s)**

**Ronda J. Winnecour,  
Trustee**

**BK NO. 19-10158 JCM**

**Chapter 13**

**Related to Claim No. 19**

**CERTIFICATE OF SERVICE  
RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 21, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)  
Debbie A. Eaton  
321 W. Townhall Road  
Waterford, PA 16441

Bradley C. Eaton dba B&J Snow Removal  
321 W. Townhall Road  
Waterford, PA 16441

Attorney for Debtor(s) (via ECF)  
Robert Shearer, Esq.  
5703 Brewster Lane  
Erie, PA 16505

Trustee (via ECF)  
Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: May 21, 2024

/s/ Denise Carlon  
Denise Carlon Esquire  
Attorney I.D. 317226  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
201-549-2363  
dcarlon@kmlawgroup.com